

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RAMIZ ZIJAD HODZIC,

a/k/a Siki Ramiz Hodzic

SEDINA UNKIC HODZIC,

NIHAD ROSIC,

a/k/a Yahya Abu Ayesha Mudzahid,

MEDIHA MEDY SALKICEVIC, and

a/k/a Medy Ummuluna,

a/k/a Bosna Mexico,

ARMIN HARCEVIC,

Defendants.

Case No. 4:15-CR-0049 CDP- DDN

**UNOPPOSED MOTION TO FILE
REPLY TO GOVERNMENT'S
RESPONSE ON DECEMBER 1,
2017**

**MOTION TO FILE REPLY TO GOVERNMENT'S
RESPONSE ON DECEMBER 1, 2017
LOCAL RULE 4.01 (C)**

COME NOW Defendants, by and through undersigned counsel, and hereby respectfully move the Court to allow the defendants to file their Reply brief to the Government's Response, on December 1, 2017, for the reasons set forth herein.

Local Rule 4.01(C) states "Within seven (7) days after being served with a memorandum in opposition, the moving party may file a reply memorandum." Previously the Court has set the date for defense Reply brief 14 and 15 days following

service when setting the briefing schedule¹, however, in the most recent order granting an extension of time for the government to file their response, (Doc. 402), the court did not give a Reply due date. The default due date under the Local Rules is presently October 18, 2017.

The Government's Response is 35 pages long. In it, the Government raises new issues and arguments which were not previously briefed or addressed in the defenses' initial Motion and Brief. Defendants request an opportunity to address these issues in a thorough and competent manner. Because this is a multi-defendant case with many attorneys who need to contribute and provide input to the drafting of our Reply, we are asking for additional time beyond 14 or 15 days previously given, and certainly beyond the seven days given under the Local Rules, to fashion a Reply. It will benefit the court in its decision making to be fully apprised of a complete and thorough argument in this matter. These reasons support Defendants' request for a due date of their Reply of December 1, 2017. This request is not made for any reasons to delay or frustrate the administration of justice in this case.

Counsel for Defendant Armin Harcevic has spoken to AUSA Matthew Drake, and Mr. Drake is not in opposition to the Defense Motion to file Defense Reply Brief on December 1, 2017.

WHEREFORE, for all of the reasons set forth above, Defendants respectfully request that this Court grants their motion to file defense Reply on December 1, 2017.

¹ Doc. 398 gave defense 15 days following service of the Response, and Doc. 388 gave defense 14 days following service of the Response.

Dated: October 16, 2017

Respectfully submitted,

/s/ Charles D. Swift

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of Defendants' Unopposed Motion to File Defendants' Reply to Government's Response on December 1, 2017, was electronically filed and served on the Court's electronic filing system:

DATED this 16th day of October, 2017.

/s/ Charles D. Swift

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